

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

John Doe,

Plaintiff,

v.

Civil Action No. 1:22-cv-00043-SM

Town of Lisbon and
New Hampshire
Department Of Justice,

Defendants.

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Defendant Town of Lisbon (the “Town”), by its attorneys, Jackson Lewis P.C. and Mitchell Municipal Group, P.A., moves this Court, pursuant to Local Rule 83.12(b)(1), to file the Certified Copy of State Court Record under seal at Level I.

The Certified Copy of State Court Record contains the name of the Plaintiff, which was sealed by order of the Superior Court, MacLeod, J., dated January 21, 2022, prior to removal. A redacted copy of the Order of Judge MacLeod is attached hereto as Exhibit A.

The Town further requests that the sealing order shall expire at the end of this litigation and upon final order of the Court, and that the documents be returned to counsel for the parties.

WHEREFORE, the Town of Lisbon requests that the above-referenced Certified Copy of State Court Record be filed under seal, and such other and further relief as the Court deems just and proper.

Respectfully submitted,
Town of Lisbon,

By its attorneys,
Jackson Lewis P.C.

Dated: February 25, 2022

By: /s/ Debra Weiss Ford
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AND

MITCHELL MUNICIPAL GROUP, P.A.

Dated: February 25, 2022

By: /s/ Naomi N. Butterfield
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CERTIFICATE OF SERVICE

I hereby certify that on this date I provided a true and exact copy of this pleading to Christopher Meier, Plaintiff's counsel of record, and Amanda Palmiera, counsel for Defendant New Hampshire Department of Justice, via electronic mail and via the Court's ECF system.

Dated: February 25, 2022

/s/ Debra Weiss Ford
Debra Weiss Ford